

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

In Re: Ladawna Alford	)	Case No. 10-47304-659
	)	Chapter 13 Proceeding
	)	
	)	
Debtor(s)	)	Hearing Date: 12/14/15
	)	Hearing Time: 10:00 a.m.
	)	Courtroom: 5 North

**ROSS H. BRIGGS, DEBTOR'S COUNSEL, RESPONSE TO ORDER TO SHOW CAUSE**

Comes Now Ross H. Briggs, Attorney At Law, and in response to this Court's Order to Show Cause, states as follows:

1. The 2016(b) filed by undersigned in this cause was intended to confirm that Debtor's pre-petition payment of attorney's fees to Attorney James Robinson would be *credited* in the favor of debtor in the course of undersigned's representation of Debtor pursuant to the flat fee option of this Court. In fact, Debtor has tendered no funds --whether a filing fee or attorney's fees-- to undersigned prior to his entry of appearance.
2. Undersigned has previously entered his appearance on behalf of numerous Chapter 13 debtors represented by Attorney Robinson prior to the suspension of Robinson in this Court. In those cases, undersigned filed identical 2016(b)s without opposition from the Trustee or Court.
3. Undersigned requests leave to file an amended 2016(b) to cure any deficiencies in the original attorney disclosure.

Respectfully submitted,

/s/ Ross H. Briggs #2709 MBE 31633  
Attorney At Law  
4144 Lindell Blvd, ste 202  
St. Louis, MO 63108  
Counsel for Debtor  
314-852-8293 [r-briggs@sbcglobal.net](mailto:r-briggs@sbcglobal.net)

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served electronically or by first class mail on this 21<sup>st</sup> day of November, 2015 to Trustee John V. LaBarge .

/s/ Ross H. Briggs